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#0616 P 001/003

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March 26, 2019

The Honorable Mitchell S. Goldberg
United States District Court - Eastern District of Pennsylvania
7614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
VIA FAX - 267-299-5056 AND FIRST CLASS MAIL

Re: **Sessay v. Peoples Commerce, Inc. Et al**
U.S.D.C., E.D. Pa., Civil Action NO. 17-cv-3219

Dear Judge Goldberg:

This office represents Peoples Commerce, Inc., in the above captioned matter. Peoples Commerce was previously represented by in-house counsel, Stephanie Pompey, Esquire. Unfortunately, Ms. Pompey never advised anyone at Peoples Commerce that this case was still pending when she left there, nor did she provide a physical file to anyone at Peoples Commerce. It is my understanding that she does not currently have a file, nor does Peoples Commerce.

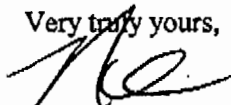
I requested that Plaintiff's counsel, Jody Thomas Lopez-Jacobs, Esquire, provide me with copies of the discovery that was previously exchanged between the parties, as well as copies of correspondence exchanged between the parties. I also offered to pay for any costs for copying these documents. In addition, I requested the names of those who have been deposed, the dates of the depositions and the name of the court reporting company for the depositions so that I may order the transcripts. Mr. Lopez-Jacobs has refused to provide me with any of the requested information. He advised me that he could not do so because he has a client to represent, and that this is not their problem.

I have no other way of obtaining these documents or this information. I did not expect this to be a controversial request.

At this time, I am requesting a telephone conference with Your Honor to resolve this issue.

Thank you for your attention to this matter.

Very truly yours,



Nicole Gerson

cc: Jody Thomas Lopez-Jacobs (VIA EMAIL - jlopez-jacobs@consumerlaw.com)



Nicole Gerson <nicolegerson@gmail.com>

Kelpala Sessay v. Peoples Commerce

4 messages

Nicole Gerson <nicolegerson@gmail.com>

Tue, Mar 26, 2019 at 1:38 PM

To: Jody Lopez-Jacobs <jlopez-jacobs@consumerslaw.com>

Jody - Can you please let me know what depositions were taken in this case, the dates, and the court reporting company?

Also, can you send me any discovery which was exchanged and correspondence between the parties? There is no physical file for this.

Thank you.
Nicole

Jody Lopez-Jacobs <jlopez-jacobs@consumerslaw.com>

Tue, Mar 26, 2019 at 2:16 PM

To: Nicole Gerson <nicolegerson@gmail.com>

Cc: Andrew Milz <amilz@consumerslaw.com>, Omeikiea Lorenzano <olorenzano@consumerslaw.com>

Nicole,

We're not in any position to share documents or case information that should be obtained from co-counsel.

Jody Thomas López-Jacobs, Esq.

Flitter Milz, P.C.

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Narberth, PA 19072

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Nicole Gerson <nicolegerson@gmail.com>

Tue, Mar 26, 2019 at 2:22 PM

To: Jody Lopez-Jacobs <jlopez-jacobs@consumerslaw.com>

Cc: Andrew Milz <amilz@consumerslaw.com>, Omeikiea Lorenzano <olorenzano@consumerslaw.com>

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GERSON, CAPEK & VORON

#0618 P.003/003

Gmail - Kalphala Sessay v. Peoples Commerce

There is no co-counsel that has a file. All I'm asking for is copies of documents that both parties previously exchanged, and the name of the court reporter for the depositions, as well as the names of those deposed, and the dates. I can then order the transcripts. I can ask the judge for his assistance, but it shouldn't be necessary. Courtesy among counsel is taken seriously in federal court.

I am happy to either pay the copy costs, or you can send them by email.

[Quoted text hidden]

Nicole Gerson <nicolegerson@gmail.com>

Tue, Mar 26, 2019 at 2:41 PM

To: Jody Lopez-Jacobs <jlopez-jacobs@consumerslaw.com>

Cc: Andrew Milz <amitz@consumerslaw.com>, Omeikiea Lorenzano <olorenzano@consumerslaw.com>

Jody -

Please allow this correspondence to confirm our telephone conversation. At that time, I reiterated that I do not have a file, nor can I get one. Prior counsel claims she does not have it, and nobody at Peoples Commerce can find it. You still refused to provide me with the names of people deposed, the dates of those depositions and the name of the court